

1 Name: TODD MICHAEL SCHULTZ

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6 In Pro Per

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8 UNITED STATES DISTRICT COURT

9 CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES

10
11 TODD MICHAEL SCHULTZ

12 2:23-CV-03452-JAK-MRWx

13 v.

14 MICHAEL C. THOMPSON
15 GREGORY R. HOLMES
16 YOUTUBE LLC

17 MOTION FOR LEAVE
18 TO FILE DISCOVERY
19 MOTION

20 I, Todd Michael Schultz (onward "Plaintiff") acting in a pro se capacity
21 hereby move the court for an ORDER, pursuant to F.R.Civ.P 26, specifying a
22 date by which all parties must confer and meet in good faith, or that a
23 MOTION FOR LEAVE TO FILE DISCOVERY MOTIONS be granted as
24 soon as is legally applicable, potentially at an accelerated time table. All
25 parties have been served. Thompson was served this morning in Kentucky
26 according to the Kenton County Sheriff Office I declare under penalty of
27 perjury. Plaintiff has no basis for good faith communications with
28 Defendants, which makes current MOTION necessary to lodge with the court
immediately to ensure trial expedience and good faith adjudication.

1 I, Plaintiff, contend that the matter at hand sufficiently
2 constitutes a "Complex Civil Case" due to its novelty in discussing AI,
3 Cyberstalking and Cyberharassment, as well as it's specific relationships
4 with novel and important to the public good laws like §230 or the
5 Communications Decency Act ("CDA"), making potential modifications
6 to procedure worthy of request or acknowledgement at least.

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8 Dated:
9 Thursday, July 10th, 2023

10 Signed
11 by: Todd Michael Schultz
12 (Plaintiff)
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